

EXHIBIT C

Ben-Sorek, Liora M

From: Ben-Sorek, Liora M
Sent: Friday, July 1, 2016 4:25 PM
To: Fred Brewington
Subject: Sharpe v. County of Nassau, et al.
Attachments: Letter to Plaintiff's Counsel re Unsealing and Confidentiality, 7-1-16.pdf; Stipulation and Authorization to Unseal Criminal Records (2).pdf; Confidentiality Agreement (Draft).pdf

Please see attached.

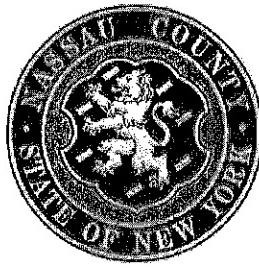
Liora M. Ben-Sorek

Deputy Bureau Chief
Litigation Bureau
Nassau County Attorney's Office
One West Street
Mineola, New York
Phone (516) 571-3014
Fax (516) 571-3058

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EDWARD P. MANGANO
County Executive

CARNELL T. FOSKEY
County Attorney



COUNTY OF NASSAU
OFFICE OF THE COUNTY ATTORNEY
One West Street
Mineola, New York 11501-4820
516-571-3056
FAX: 516-571-6604
WRITER'S DIRECT LINE: 516-571-3014

July 1, 2016

Via E-Mail

Frederick K. Brewington, Esq.
556 Peninsula Boulevard
Hempstead, New York 11550

Re: Dolores Sharpe v. County of Nassau, et al.
CV-15-6446 (ADS) (AYS)

Dear Mr. Brewington:

This letter is sent as a follow-up to last week's Initial Conference. As you are aware, the parties are to exchange Rule 26(a) disclosures by July 6 and to submit a joint status letter advising the Court on our progress concerning a confidentiality agreement.

In light of Ms. Sharpe's acquittal, her records are sealed pursuant to CPL § 160.50. The District Attorney's Office and Police Department will not release their files to our office absent a stipulation, authorization or order to unseal. In that regard, our office had provided you with a proposed stipulation and authorization which you rejected because it contains language that the materials would be used in connection with this case alone and the parties would keep it confidential. Your rejection/objection was also partly based on the fact that you already possess many documents as a result of representing Ms. Sharpe in the criminal matter. What you perhaps have not understood is that this office has not been able to obtain DA and Police Department records because of the 160.50 sealing.

Thus, the first order of business is to obtain a stipulation and/or authorization to access Ms. Sharpe's records, including but not limited to the Internal Affairs Unit investigation into her allegations of misconduct against the defendant officers. For your convenience, attached herewith is another copy of the stipulation and authorization to unseal.

Next, we will have to address the issue of confidentiality in general. In that regard, please find attached a proposed Stipulation and Order of Confidentiality. After your review, if you still object to terms of confidentiality, please call me so we can discuss. We are required to submit a joint letter to Magistrate Shields by next Friday setting forth the status of these issues.

Best wishes for a happy and safe 4th of July.

Very truly yours,

Liora M. Ben-Sorek
Deputy County Attorney

Enclosure

Ben-Sorek, Liora M

From: Ben-Sorek, Liora M
Sent: Thursday, July 7, 2016 5:03 PM
To: Fred Brewington
Subject: Sharpe v. County of Nassau, et al.

Dear Mr. Brewington:

Just a reminder that we are required to file a joint letter by tomorrow apprising the Court of the status of a confidentiality agreement in connection with the above-referenced matter.

Last week I had sent you a proposed agreement as well as another copy of a stipulation and agreement to unseal Ms. Sharpe's PD and DA files.

Very truly yours,

Liora Ben-Sorek

Liora M. Ben-Sorek
Deputy Bureau Chief
Litigation Bureau
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Ben-Sorek, Liora M

From: Fred Brewington <fred@brewingtonlaw.com>
Sent: Thursday, July 7, 2016 10:35 PM
To: Ben-Sorek, Liora M
Cc: Precilla Lockett; Rosemarie Walker
Subject: Re: Sharpe v. County of Nassau, et al.

Call you in the earlier part of the day.

Sent from my iPhone

On Jul 7, 2016, at 5:03 PM, Ben-Sorek, Liora M <lben-sorek@nassaucountyny.gov> wrote:

Dear Mr. Brewington:

Just a reminder that we are required to file a joint letter by tomorrow apprising the Court of the status of a confidentiality agreement in connection with the above-referenced matter.

Last week I had sent you a proposed agreement as well as another copy of a stipulation and agreement to unseal Ms. Sharpe's PD and DA files.

Very truly yours,

Liora Ben-Sorek

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Ben-Sorek, Liora M

From: Ben-Sorek, Liora M
Sent: Monday, July 11, 2016 9:32 AM
To: Fred Brewington
Subject: FW: Activity in Case 2:15-cv-06446-ADS-AYS Sharpe v. County Of Nassau et al Scheduling Order

Dear Mr. Brewington:

Not having heard from you by last Friday, I endeavored to submit a letter to the Court (per the Court's directive) providing a status of the case. I also requested additional time within which to provide a proposed discovery schedule and to work out the issue of sealed records and a confidentiality agreement.

I await to hear back from you regarding these open issues.

Very truly yours,

Liora Ben-Sorek

From: ecf_bounces@nyed.uscourts.gov [mailto:ecf_bounces@nyed.uscourts.gov]
Sent: Monday, July 11, 2016 9:27 AM
To: nobody@nyed.uscourts.gov
Subject: Activity in Case 2:15-cv-06446-ADS-AYS Sharpe v. County Of Nassau et al Scheduling Order

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U.S. District Court

Eastern District of New York

Notice of Electronic Filing

The following transaction was entered on 7/11/2016 at 9:26 AM EDT and filed on 7/11/2016

Case Name: Sharpe v. County Of Nassau et al

Case Number: 2:15-cv-06446-ADS-AYS

Filer:

Document Number: No document attached

Docket Text:

Electronic ORDER: Counsel are directed to submit a proposed discovery scheduling order for this Court's review by 7/15/16. Additionally, a status conference is scheduled for 8/22/2016 10:30 AM in Courtroom 830 before Magistrate Judge Anne Y. Shields. If Counsel are unavailable on that date, they may make a motion to adjourn, which shall include three suggested agreed upon dates for the adjournment. So Ordered by Magistrate Judge Anne Y. Shields on 7/11/2016. (Casalini, Rosalinde)

2:15-cv-06446-ADS-AYS Notice has been electronically mailed to:

Frederick K. Brewington fred@brewingtonlaw.com, brewingtonlawdocs@yahoo.com,
office@brewingtonlaw.com, precilla.lockett@brewingtonlaw.com

Liora M. Ben-Sorek lben-sorek@nassaucountyny.gov, ncao@nassaucountyny.gov

2:15-cv-06446-ADS-AYS Notice will not be electronically mailed to:

Ben-Sorek, Liora M

From: Fred Brewington <fred@brewingtonlaw.com>
Sent: Monday, July 11, 2016 10:23 AM
To: Ben-Sorek, Liora M
Cc: Precilla Lockett
Subject: RE: Activity in Case 2:15-cv-06446-ADS-AYS Sharpe v. County Of Nassau et al Scheduling Order

Thank you. I will review and respond as soon as I can.

From: Ben-Sorek, Liora M [lben-sorek@nassaucountyny.gov]
Sent: Monday, July 11, 2016 9:31 AM
To: Fred Brewington
Subject: FW: Activity in Case 2:15-cv-06446-ADS-AYS Sharpe v. County Of Nassau et al Scheduling Order

Dear Mr. Brewington:

Not having heard from you by last Friday, I endeavored to submit a letter to the Court (per the Court's directive) providing a status of the case. I also requested additional time within which to provide a proposed discovery schedule and to work out the issue of sealed records and a confidentiality agreement.

I await to hear back from you regarding these open issues.

Very truly yours,

Liora Ben-Sorek

From: ecf_bounces@nyed.uscourts.gov [mailto:ecf_bounces@nyed.uscourts.gov]
Sent: Monday, July 11, 2016 9:27 AM
To: nobody@nyed.uscourts.gov
Subject: Activity in Case 2:15-cv-06446-ADS-AYS Sharpe v. County Of Nassau et al Scheduling Order

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U.S. District Court
Eastern District of New York

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Case Number: 2:15-cv-06446-ADS-AYS
Filer:

Document Number: No document attached

Docket Text:

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2:15-cv-06446-ADS-AYS Notice has been electronically mailed to:

Frederick K. Brewington fred@brewingtonlaw.com, brewingtonlawdocs@yahoo.com,
office@brewingtonlaw.com, precilla.lockett@brewingtonlaw.com

Liora M. Ben-Sorek lben-sorek@nassaucountyny.gov, ncao@nassaucountyny.gov

2:15-cv-06446-ADS-AYS Notice will not be electronically mailed to:

Ben-Sorek, Liora M

From: Precilla Lockett <precilla.lockett@brewingtonlaw.com>
Sent: Thursday, July 28, 2016 9:43 AM
To: Ben-Sorek, Liora M
Cc: Fred Brewington
Subject: Re: Sharpe v. County of Nassau, et al.

Hi Liora:

I am not in the office today. I am providing Mr Brewington with a copy of this email so that you and he can discuss this matter.

Thank you

Sent from my iPhone

On Jul 28, 2016, at 9:37 AM, Ben-Sorek, Liora M <lben-sorek@nassaucountyny.gov> wrote:

Precilla:

Good morning. I'm writing to remind you that we still have not received plaintiff's initial disclosures, an authorization and/or stipulation to unseal Ms. Sharpe's PD and DA files, and a signed confidentiality order. Initial Disclosures were originally due by July 6. At your office's request, we extended that date until July 25.

Without the relevant files being unsealed, I am unable to access records related to the alleged incidents which underlie this civil proceeding. Consequently, there are no records for me to furnish in the Phase I Discovery as anticipated by Magistrate Judge Shields.

Please provide me with a status.

Regards,

Liora

Liora M. Ben-Sorek
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Ben-Sorek, Liora M

From: Ben-Sorek, Liora M
Sent: Monday, August 29, 2016 12:50 PM
To: Fred Brewington; Precilla Lockett (precilla.lockett@brewingtonlaw.com)
Subject: Sharpe v. County of Nassau, et al.

Dear Mr. Brewington:

Thank you, again, for your consideration in adjourning last week's conference.

Pursuant to Magistrate Shields' Order, we must file a letter by September 1 providing 3 dates when we are available to have the conference re-scheduled.

In that regard, please let us know of dates when you are available. Also, there are some issues that need resolution, such as a confidentiality agreement and Plaintiff's Rule 26(a) disclosures. Phase I discovery was to have been exchanged by last Friday. I am reviewing the documents which have been received from my clients so far and determining whether they would be subject to a confidentiality provision or not.

Looking forward to hearing back from you.

Very truly yours,

Liora

Liora M. Ben-Sorek
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Litigation Bureau
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